

THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

Cr. No. 24-cr-39-SE-AJ

TYLER ANDERSON

DEFENDANT'S PROPOSED VOIR DIRE

Pursuant to Rule 24 of the Federal Rules of Criminal Procedure, counsel for Mr. Anderson respectfully requests the Court to ask prospective jurors the following questions:

**A. Questions about the Defendant**

Having heard the charge, are you familiar with this case or learned about it from any media source or by other means?

Have you formed any opinions about this case or Mr. Anderson based on any media source, exposure to media coverage or by other means?

**B. Offense Specific**

Have you worked on or financially supported the presidential campaigns of Vivek Ramaswamy, Nikki Haley, or Chris Christie?

The government alleges that Mr. Anderson sent threatening communications in response to texts messages from the presidential campaigns of Vivek Ramaswamy, Nikki Haley, and Chris Christie. Knowing the political affiliation or the identity of these candidates, would you have any difficulty weighing the evidence and arguments presented during the trial fairly and impartially, regardless of your personal feelings or emotional reaction to the evidence?

It is anticipated that the evidence in this case will include explicit and graphic language. Given this, would you have any difficulty weighing the evidence and arguments presented during the trial fairly and impartially, regardless of your personal feelings or emotional reaction to the evidence?

**C. True Threat**

Do you believe that offensive speech is per se threatening? In other words, do you believe that all offensive speech is threatening?

Do you accept the proposition that the First Amendment protects hateful or offensive speech as long it is not a serious expression of an intention to commit an act of unlawful violence to an individual or group of individuals?

Do you believe that hateful, offensive speech is unlawful, even it is not threatening in nature?

Respectfully submitted,

Date: June 10, 2024

/s/ Dorothy E. Graham

Dorothy E. Graham  
Assistant Federal Defender  
22 Bridge Street  
Concord, NH  
603.226-7360

E-mail: [Dorothy\\_Graham@fd.org](mailto:Dorothy_Graham@fd.org)

**CERTIFICATE OF SERVICE**

I hereby certify that the above document was served on counsel of record on June 10, 2024 and in the manner specified herein: electronically served through CM/ECF.

/s/Dorothy E. Graham

Dorothy E. Graham